

## **REMARKS**

### **Amendments**

#### ***Revisions to the Specification and Drawings***

Applicant has added a flowchart as Fig. 4 that contain blocks representing the elements of claims 1 and 4 as originally filed and aspects of the invention described in the originally filed specification. Applicant has also amended the specification to describe Fig. 4 in the language of the claims and other language found in the originally filed specification. Because the originally filed claims are considered part of the originally filed specification, no new matter has been added as a result of the addition of Fig. 4 and its description

Applicant has further amended Figs. 1-3 to add reference numbers and lead lines where appropriate. The detailed descriptions of Figs. 1-3 have been amended to relate the amended drawings to the originally filed specification, including the originally filed claims and drawings. Applicant has further amended the specification to include an introductory paragraph to Figs. 1-3 based on the "ripe fruit" example originally associated with Fig. 3, and aspects of the invention described in the originally filed specification. Because the amendments to Figs. 1-3 and their descriptions are based on the originally filed specification, no new matter has been added by these amendments

#### ***Amendments to the Claims***

Applicant has amended the claims to clarify the language of the claims and to more particularly point out that Applicant's invention is directed toward representing fuzzy relationships between entities in multimedia sequences. No new matter has been added as a result of these amendments.

### **Objections**

#### ***Objections to the Drawings under 37 C.F.R. § 1.83(a)***

The Examiner objected to the drawings, stating that the drawings must show every feature of the invention specified in the claims. Applicant respectfully submits that the drawings as amended show those limitations in the claims that permit such illustration. Syntactical features or equations are commonly set forth in the specification and are not

required to be shown in the drawings. In addition, conventional features of the invention, such as Applicant's claimed computer-readable medium, whose detailed illustration is not necessary to understand the invention do not have to be shown in the drawings. Therefore, Applicant respectfully requests the withdrawal of the objection to the drawings under 37 C.F.R. § 1.83.

### **Rejections**

#### ***Rejections under 35 U.S.C. § 112, first paragraph***

##### **Claims 1-26**

Claims 1-26 stand rejected under the first paragraph of 35 U.S.C. § 112 for insufficiency of the written description. Applicant respectfully submits that the specification as amended complies with the written description requirement. The language of the pending claims is found in the amended detailed description of Figs. 1-4 and the drawings themselves. The particular claim language for the membership function was present in the originally filed specification starting at line 7 on page 3 through line 22 on page 4. The exemplary graph and MPEG7 syntax changes set forth in the originally filed specification starting line 28 on page 4 through line 15 on page 5 further support the language of the claims. The characteristics of MPEG7 Descriptors and DescriptionSchemes is known to those of skill in the art of multimedia and thus require no further definitions that what was present in the originally filed specification. Accordingly, Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 112.

#### ***Rejections under 35 U.S.C. § 102(b)***

##### **Claims 1-26**

Claims 1-26 stand rejected under 35 U.S.C. § 102(b) as being anticipated by US Patent 5,652,880 to Seagraves. Claims 3 and 7 have been cancelled. Applicant respectfully submits that Seagraves does not disclose each and every element of the invention as claimed in claims 1, 2, 4-6 and 8-26, as amended

Seagraves discloses using codified linkages between related objects in a database for querying and presenting such objects, their linkages and data concerning the linkages. The object data and linkages are grouped together in an outline format so the querying is

referred to as "Query-By-Outline" (QBO). The object data is textual in nature and, as described by Seagraves, each object is linked to a particular object or set of objects or it is not. Thus, none of Seagraves linkages represent "fuzzy" relationships as they are commonly understood in the art.

Therefore, Seagraves does not teach or suggest Applicant's invention that updates fuzzy relationships between entities in an audiovisual relationship as claimed in independent claims 1 and 5. Additionally, Seagraves cannot anticipate Applicant's dependent claims 2 and 6 that claim modifications to MPEG7 Description Schemes. Nor does Seagraves teach or suggest Applicant's invention that weights a fuzzy relation between description schemes in a content description for a multimedia sequence as claimed in independent claims 9 and 18. Additionally, Seagraves cannot anticipate Applicant's dependent claims 16 and 25 that claim a particular membership function expressed as an equation.

Accordingly, Applicant respectfully submits that the invention claimed in claims 1, 2, 4-6 and 8-26 is not anticipated by Seagraves under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

#### **SUMMARY**

Claims 1, 2, 4-6 and 8-26 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-3476.


**Deposit Account Authorization**

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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